

Attorney Docket No.: 0694-134

Applicant received a USPTO Advisory Action dated July 8, 2002 for the above-identified application. The following remarks are directed to that Advisory Action.

REMARKS

The Advisory Action, at ¶ 10, states as follows:

"Firstly, it has not been shown that the disclosed films, which are of the same materials and have overlapping thicknesses, do not have the claimed reflectance values. Secondly, applicants refer to the properties of the films, whereas the reference refers to the qualities of the plates bearing the films. Therefore, it cannot be determined if the comparisons are sound. Lastly, independent claim 9 has not been amended in accordance with the arguments."

We understand that the foregoing quoted statements are based on U. S. Patent No. 4,687, 687 (Terneu) and not U. S. Patent No. 5,908,704 (Friedman) because Terneu discloses use of tin and/or indium oxide whereas Friedman does not.

However, it is submitted that Terneu does not provide a sufficient basis to reject the claims of the above-identified application.

In the present invention, the heat-ray reflection film (3, in Figs. 2 and 3) is made of a material (ITO) of indium oxide containing tin and is separate from the resin intermediate film (2, in Figs. 2 and 3) of a copolymer containing TFE, HFP and VDF.

The ITO heat-ray reflection film 3 is made by the sputtering, as disclosed in the above-identified application. The ITO film consists of tin-containing indium oxide, which is also referred to as tin-doped indium oxide.

The ITO film does not always have a light reflectance. The ITO film has various conductances depending on tin content, oxidized level of the ITO film, and/or film

I-NY/1552313.1

Attorney Docket No.: 0694-134

producing condition. The infrared light reflectance of the ITO film is closely related to the conductance. Therefore, it is important for the ITO film that reflectance properties are indicated for wavelengths of the light.

In claim 1 of the above-identified application, the reflectance properties of the ITO film are specified for reflecting light having specified wavelengths, and for visible rays.

On the other hand, the first transmitting coating 13 by Terneu comprises doped tin oxide and/or doped indium oxide, according to the ABSTRACT, lines 3-5. The first coating 12 or 13 is of fluorine doped tin oxide disclosed in Examples 2-6. This shows that the first coating by Terneu comprises fluorine and tin oxide (i.e., fluorine-containing tin oxide) and/or fluorine and indium oxide (i.e., fluorine-containing indium oxide). Terneu discloses neither the example of doped indium oxide and doped indium-tin oxide, nor the example of tin-doped indium oxide.

Further, Terneu does not disclose that the first transmitting coating 13 disclosed therein has the same reflectance as the ITO film in the present invention of the above-identified application.

The tin-coating indium oxide film in the present invention is distinctly distinguished from the fluorine doped tin oxide or fluorine doped indium oxide coating disclosed by Terneu.

Further, Terneu describes in column 2, lines 8-12 and several other places in the specification thereof that the first transmitting coating (12 or 13) reduces the emissivity of that sheet face in respect of infra-red radiation having wavelengths in excess of 3 μm . This can be understood as the first transmitting coating reflecting the infra-red rays

Attorney Docket No.: 0694-134

having wavelengths exceeding $3\text{ }\mu\text{m}$ ($=3000\text{nm}$). This means that the properties of the first transmitting coating by Terneu are very different from the properties of the heat-ray reflection film in the present invention.

Accordingly, it is submitted that the Advisory Action does not support a rejection of the claims of the above-identified application based on Terneu. Moreover, claim 1 of the above-identified application is submitted as being allowable over Terneu.

Claim 9 of the above-identified application, like claim 1, states that the heat-ray reflection film is made of a tin-containing indium oxide, which has different reflectances for various light of 1500-3000 nm. Accordingly, it is submitted that the foregoing quoted statements of the Advisory Action regarding claim 9 should be withdrawn. Moreover, claim 9 is submitted as being allowable over Terneu.

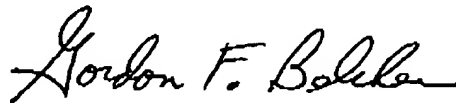
In conclusion, the present invention is substantially different from Terneu in view of the foregoing and the previous arguments by Applicants. Therefore, all of the claims of the above-identified application should be allowed.

The foregoing is submitted as being fully responsive to the Advisory Action including the rejections contained therein. Accordingly, the above-identified application is submitted as being allowable and allowance thereof is requested.

If the Examiner has any questions about the above, Applicant's Attorney Gordon F. Belcher is requested to be contacted at the below-identified telephone number. Additionally, please address all future correspondence to the below-identified address.

Attorney Docket No.: 0694-134

Respectfully submitted,



Gordon F. Belcher
Registration No. 33,156
Attorney for Applicant
MORGAN, LEWIS & BOCKIUS, LLP
101 Park Avenue
New York, New York 10178
Telephone No. (212) 309-2125

1-NY/1552313.1

5